

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:

EVAN PROCHNIAK and JAIME PROCHNIAK,

*Debtors.*

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Chapter 11

Case No. 18-12486(MDC)

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Universal Funds, LLC, by and through its undersigned counsel, has filed a Motion for Relief with the Court for relief from the automatic stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **November 1, 2018** you or your attorney must do all of the following:

- (a) File an Answer explaining your position with the Bankruptcy Clerk's Office at:

United States Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street  
Philadelphia, PA 19107

If you mail your Answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) Mail a copy to Movant's attorney:

Karin Corbett, Esquire  
OFFIT KURMAN, P.A.  
401 Plymouth Road, Suite 100  
Plymouth Meeting, PA 19462  
Telephone: (484) 531-1702  
Facsimile: (484) 531-1735  
E-mail: kcorbett@offitkurman.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman on **November 13, 2018** at **11:30 a.m.** in Courtroom #2, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
4. If a copy of the motion is not enclosed, a copy of the motion will be provide to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an Answer.

Respectfully submitted,

**OFFIT KURMAN, P.A.**

By: /s/Karin Corbett, Esquire

KARIN CORBETT, ESQUIRE

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Plymouth Meeting, PA 19462

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*Attorney for Universal Funds, LLC*

Dated: October 18, 2018